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January 13, 2016

VIA ECF

Honorable J. Paul Oetken
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: United States v. Zemlyansky, et al., 12-CR-00171 (JPO)

Dear Judge Oetken:

We are the attorneys for Michael Morgan, a defendant in the above-referenced matter. With no objection from the government or Pre-Trial Services, we write to request modification of Dr. Morgan's pretrial travel restrictions, which currently restrict Dr. Morgan's travel to the Southern and Eastern Districts of New York and the District of New Jersey.

Dr. Morgan requests permission to travel to Maghagha, Egypt to visit his 89 year-old grandfather, who is in declining health, and also to visit family in Cairo and for temporary release of his passport from Pre-Trial Services. A full itinerary, with flight information, lodging addresses, phone numbers, and names of family members to be visited shall be provided to Pre-Trial Services prior to the trip. The requested travel dates are January 22, 2016 through February 14, 2016. The Court has twice previously approved Dr. Morgan to travel to Egypt and those trips were completed without incident.

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We have communicated with Assistant United States Attorney Daniel Goldman and Dr. Morgan's Pre-Trial Services Officer, Jessalynn McCormick, who advise that the government and Pre-Trial Services have no objection to this request.

We thank the Court for its consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. Stabile', with a long horizontal flourish extending to the right.

Renato C. Stabile

cc: AUSA Daniel Goldman (via ECF)
Jessalynn McCormick, Pretrial Services (via email)